

From: [Duvil, Ricardi](#)
To: [Travis Wells](#)
Cc: [Alyssa Macy](#)
Subject: RE: EPA Letter
Date: Tuesday, November 13, 2018 5:17:00 PM
Attachments: [Warm Springs Water System 11 13 18.pdf](#)

Travis:

Attached is the letter for Warm Spring Water System regarding the Boil Water Notice.

Cheers,

Ricardi Duvil, Ph.D., P.E.

Environmental Engineer

U.S. Environmental Protection Agency

Office of Water and Watersheds

Drinking Water Unit, Region 10

1200 Sixth Ave., Suite 155, OWW-193

Seattle, WA 98101

Phone: (206)-553-2578

Fax: (206)-553-1280

From: Travis Wells <travis.wells@wstribes.org>

Sent: Tuesday, November 13, 2018 2:45 PM

To: Duvil, Ricardi <duvil.ricardi@epa.gov>

Subject: EPA Letter

I apologize for asking again but we need the letter from your office so that we can open facilities tomorrow. The COO and S/T are requesting the letter to lift the Boil Water Notice ASAP.

--

Travis Wells

General Manager

Branch of Public Utilities

O: (541) 553-3246

C: (541) 460-1262

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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 155
Seattle, WA 98101-3123

OFFICE OF
WATER AND
WATERSHEDS

November 13, 2018

Travis Wells, General Manager
Warm Springs Water Treatment Plant
Confederated Tribes of Warm Springs
P.O. Box 1196
Warm Springs, Oregon 97761

Re: Boil Water Notice Issued on November 5, 2018
Warm Springs Water Treatment Plant PWS ID# 104101247

Dear Mr. Wells:

We recently reviewed the Warm Springs Water Treatment Plant's (WSWTP) bacteriological results for total coliform and E. coli, along with chlorine residual levels sampled on November 8, 2018. We also reviewed the WSWTP's completion report for the repair due to loss of pressure event that occurred on Sunday, November 4, 2018. As you are aware, a boil water notice is currently in effect to protect public health.

Based on information provided by the WSWTP on November 11, 2018, our review showed, after the main line repair was completed, sampling results indicate that both total coliform and E. coli were absent and free chlorine residual levels have returned to baseline levels. As a result, EPA is comfortable with the WSWTP lifting the boil water notice.

If you have any questions, please contact Ricardi Duvil, Ph.D., P.E., Surface Water Rule Manager, at (206) 553-2578 or duvil.ricardi@epa.gov. We appreciate your efforts to protect the health of the customers of your drinking water system.

Sincerely,

Marie Jennings
Drinking Water Unit Manager

Cc: Alyssa Macy, Chief Operations Officer

From: [Travis Wells](#)
To: [Duvil, Ricardi](#)
Subject: Re: EPA Letter
Date: Wednesday, November 14, 2018 2:41:55 PM

Received...Thank you!

Travis Wells

General Manager

Branch of Public Utilities

Confederated Tribes of Warm Springs

p: 541.553.3452 **m:** 541.460.1262

f: 541.553.3380

a: 2251 Rehab Street
Warm Springs, OR 97761

w: warmsprings-nsn.gov **e:** travis.wells@wstribes.org

For advanced users:

On Tue, Nov 13, 2018 at 5:17 PM Duvil, Ricardi <duvil.ricardi@epa.gov> wrote:

Travis:

Attached is the letter for Warm Spring Water System regarding the Boil Water Notice.

Cheers,

Ricardi Duvil, Ph.D., P.E.

Environmental Engineer

U.S. Environmental Protection Agency

Office of Water and Watersheds

Drinking Water Unit, Region 10

1200 Sixth Ave., Suite 155, OWW-193

Seattle, WA 98101

Phone: (206)-553-2578

Fax: (206)-553-1280

From: Travis Wells <travis.wells@wstribes.org>

Sent: Tuesday, November 13, 2018 2:45 PM

To: Duvil, Ricardi <duvil.ricardi@epa.gov>

Subject: EPA Letter

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Travis Wells
General Manager
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O: (541) 553-3246
C: (541) 460-1262

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From: [Duvil, Ricardi](#)
To: [Travis Wells](#)
Subject: RE: EPA Letter
Date: Tuesday, November 13, 2018 3:59:00 PM

I will send it to in 30 minutes.

Cheers,

Ricardi Duvil, Ph.D., P.E.

Environmental Engineer

U.S. Environmental Protection Agency

Office of Water and Watersheds

Drinking Water Unit, Region 10

1200 Sixth Ave., Suite 155, OWW-193

Seattle, WA 98101

Phone: (206)-553-2578

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To: Duvil, Ricardi <duvil.ricardi@epa.gov>

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Travis Wells

General Manager

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From: [Travis Wells](#)
To: [Duvil, Ricardi](#)
Cc: [Alyssa Macy](#)
Subject: Re: Sanitary Survey Compliance
Date: Monday, April 16, 2018 1:45:50 PM

Mr. Duvil,

I am awaiting acknowledgement of the email I sent last Thursday (4/12). Please confirm my understanding and the required steps the EPA would like us to take to resolve this issue.

As always, call or email with any questions or concerns.

Thank you,
Travis Wells
General Manager
Branch of Public Utilities
O: (541) 553-3246
C: (541) 460-1262

On Thu, Apr 12, 2018 at 4:47 PM, Travis Wells <travis.wells@wstribes.org> wrote:

> Mr. Duvil,
>
> Thank you for the return call this afternoon to discuss next step
> requirements for the deficiencies noted in the Sanitary Survey done in 2015.
>
> It is my understanding that you plan to defer any compliance violations so
> long as the deficiencies noted in the 2015 sanitary survey are addressed
> before the next sanitary survey is completed this year. As part of the
> deferment, written replies such as Compliance Action Plans (CAP) will not be
> required. I also understand that as each deficiency is addressed we will
> document with pictures and descriptions of what was done.
>
> The deficiencies described in PWSID 104101247 are as follows:
>
> Improper Turbidimeter Calibration
> Improper Instrumentation or Process Controls
> Improper Contact Time Before First Customer
> Sedimentation Basin Needs Settled Solids Removed
> Corrosion on Tank Vent Stack Welded Area in Need of Repair
> Septic System has Failed and Surfacing Wastewater is Flowing toward Backwash
> Basins and River
> River Intake Air Scour System Inoperative
>
>
> There were two more deficiencies noted that did not apply to this treatment
> facility since we do not introduce Fluoride or Bromate.
>
> Please review and confirm the action you will be taking. If there are
> additional clarifications or items that need to be added, please do so and
> reply back to me.
>
> Thank You,

>
> Travis Wells
> General Manager
> Branch of Public Utilities
> O: (541) 553-3246
> C: (541) 460-1262

--

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From: [Duvil, Ricardi](#)
To: [Travis Wells](#)
Cc: [Alyssa Macy](#)
Subject: RE: Sanitary Survey Compliance
Date: Monday, April 16, 2018 3:38:00 PM

Hi Travis,

Thanks for your email. As I mentioned during our conversation, EPA will not issue any violations as long as the deficiencies noted in the 2015 sanitary survey CAP are addressed before the next sanitary survey. I look forward for your final report which should include pictures and descriptions of what was done to address the deficiencies. Thanks !

Cheers,

Ricardi Duvil, Ph.D., P.E.

Environmental Engineer

U.S. Environmental Protection Agency

Office of Water and Watersheds

Drinking Water Unit, Region 10

1200 Sixth Ave., Suite 155, OWW-193

Seattle, WA 98101

Phone: (206)-553-2578

Fax: (206)-553-1280

From: Travis Wells [mailto:travis.wells@wstribes.org]

Sent: Thursday, April 12, 2018 4:47 PM

To: Duvil, Ricardi <duvil.ricardi@epa.gov>

Cc: Alyssa Macy <alyssa.macy@wstribes.org>

Subject: Sanitary Survey Compliance

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The deficiencies described in PWSID 104101247 are as follows:

1. Improper Turbidimeter Calibration
2. Improper Instrumentation or Process Controls
3. Improper Contact Time Before First Customer
4. Sedimentation Basin Needs Settled Solids Removed
5. Corrosion on Tank Vent Stack Welded Area in Need of Repair
6. Septic System has Failed and Surfacing Wastewater is Flowing toward Backwash Basins and River
7. River Intake Air Scour System Inoperative

There were two more deficiencies noted that did not apply to this treatment facility since we do not introduce Fluoride or Bromate.

Please review and confirm the action you will be taking. If there are additional clarifications or items that need to be added, please do so and reply back to me.

Thank You,

Travis Wells

General Manager

Branch of Public Utilities

O: (541) 553-3246

C: (541) 460-1262

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From: [Travis Wells](#)
To: [Duvil, Ricardi](#)
Subject: Re: Sanitary Survey
Date: Thursday, November 8, 2018 1:18:02 PM

Ladd tells me that he has received the SS.

On Thu, Nov 8, 2018 at 10:53 AM Duvil, Ricardi <duvil.ricardi@epa.gov> wrote:

Hi Travis:

Could you please get in touch with Ladd regarding the Sanitary Survey ? Ladd just contacted me again today because he has not received your SS. Thanks !

Cheers,

Ricardi Duvil, Ph.D., P.E.

Environmental Engineer

U.S. Environmental Protection Agency

Office of Water and Watersheds

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Travis Wells
General Manager
Branch of Public Utilities
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From: [Travis Wells](#)
To: [Jennings, Marie](#)
Cc: [Alyssa Macy](#); [Chico Holliday](#); Mathew.Martinson@ihs.gov; [Opalski, Dan](#); [Duvil, Ricardi](#); [Chung, Angela](#); [Wilson, Wenona](#); [Thurmon, Clarke](#); [Contreras, Peter](#); [Steiner-Riley, Cara](#)
Subject: Re: Significant Sanitary Survey Deficiencies at the Warm Springs Water Treatment Plant
Date: Thursday, December 6, 2018 4:50:11 PM

Ms. Jennings,

With regard to the three items listed on page one of the letter you reference:

1. Re-calibrate the turbidity meter and maintain calibration on a monthly basis.

During your site visit on 5 Dec 2018, you will recall that Laddie Folster from IHS was at the water treatment plant and was helping our operator, Ron Palmer, prepare to calibrate the turbidity meter. I have not received a site report from Laddie regarding the calibration. Once I receive his site report, I will forward a copy to your office as proof the calibration was completed. I will also instruct our operators that the calibration must be completed monthly until EPA changes the requirement to the standard quarterly calibration.

2. Remove the solids from the settling tanks.

As we mentioned during the site visit, we are planning to complete the solids removal sometime in January provided we can get a tanker under contract to haul the solids to our local landfill. Currently, our finance department is not processing any new contracts until the beginning of the fiscal year which, for us, begins in January of 2019. The time frame may extend a bit into February based on the weather we experience as the solids slurry will need some time to evaporate. I would expect that we have this completed no later than the end of February 2019.

3. Develop and implement standard operating procedures regarding the coagulation process.

IHS, through Laddie Folster, is providing the technical assistance needed to complete this task. The operator and Laddie were able to revive the SCM so that it was usable to make the necessary adjustments for dosing the ACH. Laddie will be providing recommendations of SOP's as part of his site visit report which we plan to implement as soon as possible. With regard to the adverse interaction of the chlorine and ACH, Laddie didn't have time to test a couple of scenarios to see if there was any significant adverse interactions. He will also outline procedures for the operators to try to see if the chlorine and ACH amounts used have any negative effects. All of this will be described in Laddie's report which we will forward to you folks for review.

Please let me know if this response is sufficient for your request. I will forward the report submitted by Laddie Folster as soon as I receive it as well. Please do not hesitate to contact me with any questions or concerns.

Travis Wells

General Manager

Branch of Public Utilities

Confederated Tribes of Warm Springs

p: 541.553.3452 **m:** 541.460.1262

f: 541.553.3380

a: 2251 Rehab Street

Warm Springs, OR 97761

w: warmsprings-nsn.gov **e:** travis.wells@wstribes.org

For advanced users:

On Wed, Nov 28, 2018 at 11:07 AM Jennings, Marie <Jennings.Marie@epa.gov> wrote:

Greetings,

Please find attached a letter from EPA to the Honorable Chairman Austin Greene, Jr., of the Confederated Tribes of Warm Springs, regarding serious public health concerns and long-standing sanitary survey significant deficiencies at the Warm Springs Water Treatment Plant. This letter was emailed to the Chairman on 11/27/18. The original paper version has been sent through certified mail.

Marie Jennings

Drinking Water Unit, Manager

206-553-1893

206-369-9625 - EPA cell

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From: [Jennings, Marie](#)
To: [Travis Wells](#)
Cc: [Alyssa Macy](#); [Chico Holliday](#); [Mathew.Martinson@ihs.gov](#); [Opalski, Dan](#); [Duvil, Ricardi](#); [Chung, Angela](#); [Wilson, Wenona](#); [Thurmon, Clarke](#); [Contreras, Peter](#); [Steiner-Riley, Cara](#)
Subject: RE: Significant Sanitary Survey Deficiencies at the Warms Spring Water Treatment Plant
Date: Friday, December 7, 2018 9:46:04 AM

Hello Mr. Wells

Let me say again, how much EPA appreciated the hospitality of the Tribal Council on Tuesday and we appreciate your timely response to the letter we sent last week. The purpose of this email is to acknowledge that we are in receipt of your response and if we have questions we will get back to you.

Marie Jennings
Drinking Water Unit, Manager
206-553-1893
206-369-9625 - EPA cell

From: Travis Wells <travis.wells@wstribes.org>
Sent: Thursday, December 06, 2018 4:50 PM
To: Jennings, Marie <Jennings.Marie@epa.gov>
Cc: Alyssa Macy <alyssa.macy@wstribes.org>; Chico Holliday <chico.holliday@wstribes.org>; Mathew.Martinson@ihs.gov; Opalski, Dan <Opalski.Dan@epa.gov>; Duvil, Ricardi <duvil.ricardi@epa.gov>; Chung, Angela <Chung.Angela@epa.gov>; Wilson, Wenona <Wilson.Wenona@epa.gov>; Thurmon, Clarke <Thurmon.Clarke@epa.gov>; Contreras, Peter <Contreras.Peter@epa.gov>; Steiner-Riley, Cara <Steiner-Riley.Cara@epa.gov>
Subject: Re: Significant Sanitary Survey Deficiencies at the Warms Spring Water Treatment Plant

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Please let me know if this response is sufficient for your request. I will forward the report submitted by Laddie Folster as soon as I receive it as well. Please do not hesitate to contact me with any questions or concerns.

Travis Wells

General Manager

Branch of Public Utilities

Confederated Tribes of Warm Springs

p: 541.553.3452 m: 541.460.1262

f: 541.553.3380

a: 2251 Rehab Street

Warm Springs, OR 97761

w: warmsprings-nsn.gov e: travis.wells@wstribes.org

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Marie Jennings

Drinking Water Unit, Manager

206-553-1893

206-369-9625 - EPA cell

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From: [Duvil, Ricardi](#)
To: [Travis Wells](#); [Alyssa Macy](#); [Graham, Russell \(IHS/POR\)](#); chico.holliday@wstribes.org
Subject: RE: Turbidity Issue at the WS WTP
Date: Wednesday, October 17, 2018 8:37:00 AM

Morning Travis:

Thanks for your email. I will review your supporting documents and get back to you later.

I still want to know when was the last time you calibrated your turbidity meter ?

Cheers,

Ricardi Duvil, Ph.D., P.E.

Environmental Engineer

U.S. Environmental Protection Agency

Office of Water and Watersheds

Drinking Water Unit, Region 10

1200 Sixth Ave., Suite 155, OWW-193

Seattle, WA 98101

Phone: (206)-553-2578

Fax: (206)-553-1280

From: Travis Wells [mailto:travis.wells@wstribes.org]

Sent: Wednesday, October 17, 2018 7:17 AM

To: Alyssa Macy <alyssa.macy@wstribes.org>; Graham, Russell (IHS/POR)

<russell.graham@wstribes.org>; Duvil, Ricardi <duvil.ricardi@epa.gov>

Subject: Fwd: Turbidity Issue at the WS WTP

----- Forwarded message -----

From: **Chico Holliday** <chico.holliday@wstribes.org>

Date: Wed, Oct 17, 2018 at 7:15 AM

Subject: Re: Turbidity Issue at the WS WTP

To: Travis Wells <travis.wells@wstribes.org>

might i add the our water/wastewater did flush hydrants and took chlorine readings throughout the system on friday 10-12-18 morning begining at 8:00 am and ending on 10-13-18 at 330 pm .

On Tue, Oct 16, 2018 at 3:52 PM Travis Wells <travis.wells@wstribes.org> wrote:

Mr. Duvil,

Based on what we knew (myself, Chico and Russell) at the time we decided to issue a notice of the exceedance of the allowable turbidity levels at the Warm Springs Water Treatment Plant. We found out about the issue late Thursday (10/11/18) and met to discuss the issue first thing Friday morning (10/12/18). We made several attempts to get in touch with somebody from EPA with no success. We did issue a release of information to our local radio station to inform consumers that we did exceed the allowable turbidity levels.

The time line is as follows:

1615 hrs on 10/11/18 - i was notified via email by our Chief Operations Officer, who received a call from the IHS director Mathew Martinson regarding an issue with no coagulant being used in the treatment plant.

1650 hrs on 10/11/18 - I was finally able to confirm that the plant was being operated with the use of Aluminum Chlorohydrate (ACH) since the afternoon of 10/8/18. By the time I was able to find phone numbers for EPA contacts it was after 1700 hrs and I decided to address the issue first thing in the morning.

0800 hrs on 10/12/18 - met with the W&WW supervisor, the environmental health specialist and myself to discuss a course of action. Based on the info we had and

the fact that the threat had largely come and gone we decided to issue the notice of the turbidity exceedance. We also made several attempts to contact the EPA offices with no success so our decision stood as we had originally decided.

1400 hrs - notice was issued to the local radio station.

We discussed the issue at length and the deciding factor was that the water system was already running 24 hours of properly treated water so flushing and issuing a boil notice didn't seem to make sense as the water was "good" water by the time we had been informed of the issue. It seemed unnecessary to flush good water and to issue a boil water notice for water that was then meeting the requirements.

We are also currently working on what needs to be done with the operator who continued to run even though there was no chemical to use. This is basic knowledge for an operator and should never have happened.

Ive attached the turbidity and chlorine level info you requested along with the notice we sent out last Friday.

Pleas contact me with any questions or concerns .

Travis Wells

General Manager

Branch of Public Utilities

Confederated Tribes of Warm Springs

p: 541.553.3452 m: 541.460.1262

f: 541.553.3380

a: 2251 Rehab Street

Warm Springs, OR 97761

w: warmsprings-nsn.gov e: travis.wells@wstribes.org

For advanced users:

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Travis Wells

General Manager

Branch of Public Utilities

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From: [Travis Wells](#)
To: [Duvil, Ricardi](#)
Cc: [Alyssa Macy](#); [Graham, Russell \(IHS/POR\)](#); [Chico Holliday](#)
Subject: Re: Turbidity Issue at the WS WTP
Date: Wednesday, October 17, 2018 9:57:24 AM

Based on info provided by the plant operators the last time the lab turbidimeter was calibrated was 4/24/16 and the monitoring turbidimeters were calibrated on 4/20/16.

Travis Wells

General Manager

Branch of Public Utilities

Confederated Tribes of Warm Springs

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f: 541.553.3380

a: 2251 Rehab Street

Warm Springs, OR 97761

w: warmsprings-nsn.gov **e:** travis.wells@wstribes.org

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Ricardi Duvil, Ph.D., P.E.

Environmental Engineer

U.S. Environmental Protection Agency

Office of Water and Watersheds

Drinking Water Unit, Region 10

1200 Sixth Ave., Suite 155, OWW-193

Seattle, WA 98101

Phone: (206)-553-2578

Fax: (206)-553-1280

From: Travis Wells [mailto:travis.wells@wstribes.org]

Sent: Wednesday, October 17, 2018 7:17 AM
To: Alyssa Macy <alyssa.macy@wstribes.org>; Graham, Russell (IHS/POR) <russell.graham@wstribes.org>; Duvil, Ricardi <duvil.ricardi@epa.gov>
Subject: Fwd: Turbidity Issue at the WS WTP

----- Forwarded message -----

From: **Chico Holliday** <chico.holliday@wstribes.org>
Date: Wed, Oct 17, 2018 at 7:15 AM
Subject: Re: Turbidity Issue at the WS WTP
To: Travis Wells <travis.wells@wstribes.org>

might i add the our water/wastewater did flush hydrants and took chlorine readings throughout the system on friday 10-12-18 morning begining at 8:00 am and ending on 10-13-18 at 330 pm .

On Tue, Oct 16, 2018 at 3:52 PM Travis Wells <travis.wells@wstribes.org> wrote:

Mr. Duvil,

Based on what we knew (myself, Chico and Russell) at the time we decided to issue a notice of the exceedance of the allowable turbidity levels at the Warm Springs Water Treatment Plant. We found out about the issue late Thursday (10/11/18) and met to discuss the issue first thing Friday morning (10/12/18). We made several attempts to get in touch with somebody from EPA with no success. We did issue a release of information to our local radio station to inform consumers that we did exceed the allowable turbidity levels.

The time line is as follows:

1615 hrs on 10/11/18 - i was notified via email by our Chief Operations Officer, who received a call from the IHS director Mathew Martinson regarding an issue with no coagulant being used in the treatment plant.

1650 hrs on 10/11/18 - I was finally able to confirm that the plant was being operated with the use of Aluminum Chlorohydrate (ACH) since the afternoon of 10/8/18. By the time I was able to find phone numbers for EPA contacts it was after 1700 hrs and I decided to address the issue first thing in the morning.

0800 hrs on 10/12/18 - met with the W&WW supervisor, the environmental health specialist and myself to discuss a course of action. Based on the info we had and the fact that the threat had largely come and gone we decided to issue the notice of the turbidity exceedance. We also made several attempts to contact the EPA offices with no success so our decision stood as we had originally decided.

1400 hrs - notice was issued to the local radio station.

We discussed the issue at length and the deciding factor was that the water system was already running 24 hours of properly treated water so flushing and issuing a boil notice didn't seem to make sense as the water was "good" water by the time we had been informed of the issue. It seemed unnecessary to flush good water and to issue a boil water notice for water that was then meeting the requirements.

We are also currently working on what needs to be done with the operator who continued to run even though there was no chemical to use. This is basic knowledge for an operator and should never have happened.

Ive attached the turbidity and chlorine level info you requested along with the notice we sent out last Friday.

Pleas contact me with any questions or concerns .

Travis Wells

General Manager

Branch of Public Utilities

Confederated Tribes of Warm Springs

p: 541.553.3452 m: 541.460.1262

f: 541.553.3380

a: 2251 Rehab Street

Warm Springs, OR 97761

w: warmsprings-nsn.gov e: travis.wells@wstribes.org

For advanced users:

--

Travis Wells

General Manager

Branch of Public Utilities

O: (541) 553-3246

C: (541) 460-1262

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and may be unlawful.

From: Manheimer, Jenna
Sent: Wednesday, November 7, 2018 10:38 AM
To: Duvil, Ricardi; Tucker, Michelle
Subject: RE: Warm Springs Not Signing SS Report

From Laddie:

I sent it to Travis but he said Chico was reviewing it. Then he would need the Chief Operations Officer at the Tribe to approve signing it and returning it. Alyssa Macy is the COO. The SS was sent to Tribe on 8-27-2018.

From: Duvil, Ricardi
Sent: Wednesday, November 7, 2018 9:41 AM
To: Manheimer, Jenna <Manheimer.Jennifer@epa.gov>; Tucker, Michelle <Tucker.Michelle@epa.gov>
Subject: RE: Warm Springs Not Signing SS Report

Hi Jenna:

I am talking to Travis this morning. The SS is on my list of items that I plan to discuss with him.

Cheers,

Ricardi Duvil, Ph.D., P.E.
Environmental Engineer
U.S. Environmental Protection Agency
Office of Water and Watersheds
Drinking Water Unit, Region 10
1200 Sixth Ave., Suite 155, OWW-193
Seattle, WA 98101
Phone: (206)-553-2578
Fax: (206)-553-1280

From: Manheimer, Jenna
Sent: Wednesday, November 07, 2018 9:37 AM
To: Tucker, Michelle <Tucker.Michelle@epa.gov>; Duvil, Ricardi <duvil.ricardi@epa.gov>
Subject: Warm Springs Not Signing SS Report

Hi Michelle and Ricardi,

Ladd just let me know that Travis Wells from Warm Springs has not yet signed the SS report, which he's had since mid-August. Ladd has bugged him a few times, and he said he would have it done by next week. If Travis does not deliver, could you please let Ladd know how you would like to proceed?

Thank you,
Jenna

From: Duvil, Ricardi
Sent: Wednesday, November 7, 2018 9:41 AM
To: Manheimer, Jenna; Tucker, Michelle
Subject: RE: Warm Springs Not Signing SS Report

Hi Jenna:

I am talking to Travis this morning. The SS is on my list of items that I plan to discuss with him.

Cheers,

Ricardi Duvil, Ph.D., P.E.
Environmental Engineer
U.S. Environmental Protection Agency
Office of Water and Watersheds
Drinking Water Unit, Region 10
1200 Sixth Ave., Suite 155, OWW-193
Seattle, WA 98101
Phone: (206)-553-2578
Fax: (206)-553-1280

From: Manheimer, Jenna
Sent: Wednesday, November 07, 2018 9:37 AM
To: Tucker, Michelle <Tucker.Michelle@epa.gov>; Duvil, Ricardi <duvil.ricardi@epa.gov>
Subject: Warm Springs Not Signing SS Report

Hi Michelle and Ricardi,

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Thank you,
Jenna

From: Manheimer, Jenna
Sent: Wednesday, November 7, 2018 9:44 AM
To: Duvil, Ricardi; Tucker, Michelle
Cc: Folster, Laddie (IHS/POR)
Subject: RE: Warm Springs Not Signing SS Report

Perfect! Thanks!

From: Duvil, Ricardi
Sent: Wednesday, November 7, 2018 9:41 AM
To: Manheimer, Jenna <Manheimer.Jennifer@epa.gov>; Tucker, Michelle <Tucker.Michelle@epa.gov>
Subject: RE: Warm Springs Not Signing SS Report

Hi Jenna:

I am talking to Travis this morning. The SS is on my list of items that I plan to discuss with him.

Cheers,

Ricardi Duvil, Ph.D., P.E.
Environmental Engineer
U.S. Environmental Protection Agency
Office of Water and Watersheds
Drinking Water Unit, Region 10
1200 Sixth Ave., Suite 155, OWW-193
Seattle, WA 98101
Phone: (206)-553-2578
Fax: (206)-553-1280

From: Manheimer, Jenna
Sent: Wednesday, November 07, 2018 9:37 AM
To: Tucker, Michelle <Tucker.Michelle@epa.gov>; Duvil, Ricardi <duvil.ricardi@epa.gov>
Subject: Warm Springs Not Signing SS Report

Hi Michelle and Ricardi,

Ladd just let me know that Travis Wells from Warm Springs has not yet signed the SS report, which he's had since mid-August. Ladd has bugged him a few times, and he said he would have it done by next week. If Travis does not deliver, could you please let Ladd know how you would like to proceed?

Thank you,
Jenna

From: Bouck, Steve
Sent: Monday, November 19, 2018 3:38 PM
To: Duvil, Ricardi
Subject: RE: Warm Springs Water System Turbidity Treatment Technique Violation _11_19_2018

Hello Ricardi,
Thanks for sharing. These documents all look fine to me. Good product.

Steve Bouck
U.S. EPA, REGION 10
DRINKING WATER UNIT
1200 Sixth Avenue, Suite 155, OWW-193
Seattle, WA 98101-3140
(206)553-1089

From: Duvil, Ricardi
Sent: Monday, November 19, 2018 3:19 PM
To: Travis Wells <travis.wells@wstribes.org>
Cc: Alyssa Macy <alyssa.macy@wstribes.org>; Jennings, Marie <Jennings.Marie@epa.gov>; Martinson, Mathew J (IHS/POR) <Mathew.Martinson@ihs.gov>; Folster, Laddie (IHS/POR) <Laddie.Folster@ihs.gov>; Manheimer, Jenna <Manheimer.Jennifer@epa.gov>; Clark, Johnny <Clark.Johnny@epa.gov>; Schuster, Jane <schuster.jane@epa.gov>; Bouck, Steve <Bouck.Steve@epa.gov>; Robinson, Lorie <Robinson.Lorie@epa.gov>; Affeldt, Chris <Affeldt.Christopher@epa.gov>; Blust, Molly E. <blust.molly@epa.gov>
Subject: Warm Springs Water System Turbidity Treatment Technique Violation _11_19_2018

Dear Mr. Wells:

As we discussed from our previous conversation, I have attached our Turbidity Treatment Technique Violation letter along with Tier II public notice requirements. As you know, turbidity must be less than or equal to 0.3 NTU in at least 95 % of the measurements taken each month. That is, 95 percent of the measurements recorded every 4 hours must be less than or equal 0.3 NTU over each calendar month period. Failure to meet the Combined Filter Effluent (CFE) requirements is a treatment technique violation.

If you have any questions or need help with the public notice requirements, feel free to contact me.

Thank you for your prompt attention to this important matter.

Cheers,

Ricardi Duvil, Ph.D., P.E.
Environmental Engineer
U.S. Environmental Protection Agency
Office of Water and Watersheds
Drinking Water Unit, Region 10
1200 Sixth Ave., Suite 155, OWW-193
Seattle, WA 98101
Phone: (206)-553-2578
Fax: (206)-553-1280

From: [Alyssa Macy](#)
To: [Duvil, Ricardi](#)
Cc: [Travis Wells](#); [Jennings, Marie](#); [Martinson, Mathew J \(IHS/POR\)](#); [Folster, Laddie \(IHS/POR\)](#); [Manheimer, Jenna](#); [Clark, Johnny](#); [Schuster, Jane](#); [Bouck, Steve](#); [Robinson, Lorie](#); [Affeldt, Chris](#); [Blust, Molly E.](#)
Subject: Re: Warm Springs Water System Turbidity Treatment Technique Violation _11_19_2018
Date: Wednesday, December 26, 2018 4:03:18 PM
Attachments: [Warm Springs Water System PUBLIC NOTICE CERTIFICATION FORM November 19 2018 SIGNED.pdf](#)
[2018.12.26 NOV letter to public WS CWS FINAL.docx.pdf](#)

Ricardi,

We anticipate that EPA has been furloughed but wanted to send the public notification form for the turbidity exceedance anyway. Please let us know if you need additional information or have questions. We will also fax as directed on the bottom of the form.

Thank you,

Alyssa

photo



Alyssa Macy

Chief Operations Officer, Confederated Tribes of Warm Springs, Oregon



541-553-3212



<https://warmsprings-nsn.gov/>



1233 Veterans Street / PO Box 455, Warm Springs, OR 97761



On Mon, Nov 19, 2018 at 3:18 PM Duvil, Ricardi <duvil.ricardi@epa.gov> wrote:

Dear Mr. Wells:

As we discussed from our previous conversation, I have attached our Turbidity Treatment Technique Violation letter along with Tier II public notice requirements. As you know, turbidity must be less than or equal to 0.3 NTU in at least 95 % of the measurements taken each month. That is, 95 percent of the measurements recorded every 4 hours must be less than or equal 0.3 NTU over each calendar month period. Failure to meet the Combined Filter Effluent (CFE) requirements is a treatment technique violation.

If you have any questions or need help with the public notice requirements, feel free to contact me.

Thank you for your prompt attention to this important matter.

Cheers,

Ricardi Duvil, Ph.D., P.E.

Environmental Engineer

U.S. Environmental Protection Agency

Office of Water and Watersheds

Drinking Water Unit, Region 10

1200 Sixth Ave., Suite 155, OWW-193

Seattle, WA 98101

Phone: (206)-553-2578

Fax: (206)-553-1280

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PUBLIC NOTICE CERTIFICATION FORM

PUBLIC WATER SYSTEM NAME Warm Springs Community Water System

PUBLIC WATER SYSTEM ID 104101247

DESCRIPTION OF VIOLATION(S) TURBIDITY EXCEEDANCE

VIOLATION DATE(S) November 19, 2018

The public water system named above hereby affirms that public notice has been provided to consumers in accordance with the delivery, content, and format requirements and deadlines as required by 40 CFR Part 141 Subpart Q.

☐ Consultation with EPA (if required) on the following date(s) N/A

☐ Notice distributed by the following method(s) (for example, mail, posting, etc. The notice has been posted online at: <https://warmsprings-nsn.gov/2018/12/swtrs-turbidity-exceedance-notice-dec-26-2018/>. It will also be printed in the Spilyay Tymoo, to be published. This newspaper is distributed locally to all Warm Springs PO boxes which includes residents from Warm Sprigns, Simnasho, and Sidwalter. There is no home mail delivery in Warm Springs.

on the following date(s): The notice will be printed in the Spilyay Tymoo edition to be published on Jan. 2, 2019.

☐ Notice posted at the following location(s): Notice has been posted at the Tribal Administration Building, WS Housing Authority, WS Senior Center, US Post Office, Warm Springs Market, and WS Community Center.

on the following date(s): Dec. 26, 2018.


Signature of owner or operator

December 26, 2018
date

Send completed form and copy of public notice to EPA by

fax to (206) 553-1280 or

mail to Drinking Water Unit
Environmental Protection Agency
1200 Sixth Ave, Suite 155, OWW-193
Seattle, WA 98101-3123



Confederated Tribes of Warm Springs, Oregon
Public Utilities Branch
PO Box 1196
Warm Springs, OR 97761
Phone: 541-553-3246
Fax: 541-553-3380

SWTRs Turbidity Exceedance Notice

IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER

Warm Springs Water System PWS ID# 104101247 Did Not Meet Treatment Requirements-Turbidity

Our water system recently violated a drinking water requirement. Although this was not an emergency, as our customers, you have a right to know what happened, what you should do, and what we did (are doing) to correct this situation.

We routinely monitor your water for turbidity (cloudiness). This tells us whether we are effectively filtering the water supply. Water samples for October 2018 showed that 13.77 percent of turbidity measurements were over 0.3 turbidity units (NTUs) – the standard is that no more than 5 percent of samples may exceed 0.3 turbidity units per month. The turbidity levels are relatively low. However, their persistence is a concern. Normal turbidity levels at our plant are .03 units.

What should I do?

- There is nothing you need to do. You do not need to boil your water or take other actions. We do not know of any contamination, and none of our testing has shown disease-causing organisms in the drinking water.
- If you have a severely compromised immune system, have an infant, are pregnant, or are elderly, you may be at increased risk and should seek advice from your health care providers about drinking this water. General guidelines on ways to lessen the risk of infection by microbes are available from EPA's Safe Drinking Water Hotline at 1-800-426-1791.

What does this mean?

This is not an emergency. If it had been, you would have been notified within 24 hours.

Turbidity has no health effects. However, turbidity can interfere with disinfection and provide a medium for microbial growth. Turbidity may indicate the presence of disease causing organisms. These organisms include bacteria, viruses, and parasites which can cause symptoms such as nausea, cramps, diarrhea, and associated headaches. These symptoms are not caused only by organisms in drinking water. If you experience any of these symptoms and they persist, you may want to seek medical advice.

What is being done?

Water treatment plant operators have been working in conjunction with the Engineers and staff from Indian Health Services to resolve the issues at the water treatment plant and have recalibrated turbidity meters on Dec. 6. We are currently jar testing to determine the best chemical and dosage available to treat the raw water. We are also working under the advisory of the Environment Protection Agency and the Oregon Health Authority to minimize any event(s) in the future.

For more information, please contact Travis Wells, Branch of Public Utilities General Manager, at 541-553-3246 or travis.wells@wstribes.org.

Please share this information with all the other people who drink this water, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools, and businesses). You can do this by posting this notice in a public place or distributing copies by hand or mail.

This notice is being sent to you by the Warm Springs Public Water System. State Water System ID#: 104101247. Date distributed: Dec. 26, 2018



From: Duvil, Ricardi
Sent: Thursday, November 8, 2018 10:54 AM
To: Travis Wells
Subject: Sanitary Survey

Hi Travis:

Could you please get in touch with Ladd regarding the Sanitary Survey ? Ladd just contacted me again today because he has not received your SS. Thanks !

Cheers,

Ricardi Duvil, Ph.D., P.E.
Environmental Engineer
U.S. Environmental Protection Agency
Office of Water and Watersheds
Drinking Water Unit, Region 10
1200 Sixth Ave., Suite 155, OWW-193
Seattle, WA 98101
Phone: (206)-553-2578
Fax: (206)-553-1280

From: [Jennings, Marie](#)
To: alyssa.macy@wstribes.org; travis.wells@wstribes.org; [Martinson, Mathew J \(IHS/POR\)](#)
(Mathew.Martinson@ihs.gov)
Cc: [Opalski, Dan](#); [Duvil, Ricardi](#); [Chung, Angela](#); [Wilson, Wenona](#); [Thurmon, Clarke](#); [Contreras, Peter](#); [Steiner-Riley, Cara](#)
Subject: Significant Sanitary Survey Deficiencies at the Warm Springs Water Treatment Plant
Date: Wednesday, November 28, 2018 11:07:23 AM
Attachments: [2018_11_27_12_47_33.pdf](#)

Greetings,

Please find attached a letter from EPA to the Honorable Chairman Austin Greene, Jr., of the Confederated Tribes of Warm Springs, regarding serious public health concerns and long-standing sanitary survey significant deficiencies at the Warm Springs Water Treatment Plant. This letter was emailed to the Chairman on 11/27/18. The original paper version has been sent through certified mail.

Marie Jennings
Drinking Water Unit, Manager
206-553-1893
206-369-9625 - EPA cell



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

1200 Sixth Avenue, Suite 155
Seattle, WA 98101-3123

OFFICE OF
WATER AND
WATERSHEDS

NOV 27 2018

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Honorable Chairman Austin Greene, Jr.
Confederated Tribes of Warm Springs
P.O. Box C
1233 Veteran's Street
Warm Springs, Oregon 97761-3001

Re: Immediate Public Health Concerns and Sanitary Survey Significant Deficiencies at the Warm Springs Water Treatment Plant PWS ID# 104101247

Dear Chairman Greene:

This letter is to inform you that the Environmental Protection Agency has serious concerns regarding the Warm Springs Water Treatment Plant. We previously have shared our concerns with your staff and now are elevating these issues to you, with the goal of working together at the leadership level, to quickly improve conditions.

Significant deficiencies were identified at the Warm Springs Water Treatment Plant during the recent July 2018 sanitary survey, many of which were also identified in the January 2015 sanitary survey. The EPA is concerned by the apparent lack of attention the significant deficiencies highlighted in the 2018 sanitary survey are receiving from the Tribe.

In light of this concern and the recent boil water advisory, the turbidity exceedances resulting from the failure to use coagulant for a number of days, and other issues, the EPA is requesting a response no later than December 7, 2018, explaining how the Confederated Tribes of Warm Springs (Tribe) intends to address the most immediate public health concerns listed below.

Immediate Public Health Concerns

In order to address the threat to public health, **no later than December 7, 2018**, please provide the EPA a list of actions with an associated timeline that the Tribe intends to take to address the following concerns:

1. Recalibrate the turbidimeter and maintain calibration on a monthly basis.
2. Remove the solids from the settling tanks.
3. Develop and implement standard operating procedures regarding the coagulation process (see Enclosure A, first bullet).

July 2018 Sanitary Survey Significant Deficiencies

The EPA is also concerned about the overall list of significant deficiencies outlined in the July 2018 sanitary survey. These significant deficiencies also have the potential to impair water quality and jeopardize public health (Enclosure A). Under the regulations, **all significant deficiencies must be corrected within 45 days** from receipt of this letter. Many of these significant deficiencies were noted in the previous sanitary survey of January 2015. If the Tribe is not able to address the significant deficiencies within 45 days of receiving this letter, the Tribe will be in violation of the National Primary Drinking Water Regulations (40 CFR §142.16(b)) and must notify the EPA immediately. If the Tribe is unable to address the significant deficiencies, the Tribe must submit an approvable corrective action plan (CAP) with a timeline to address these deficiencies. The EPA reserves the right to use available authorities pursuant to Section 1414 of the Safe Drinking Water Act, or under Section 1431 if necessary to ensure protection of public health.

The list of significant deficiencies for the Tribe's water system is provided in Enclosure A – Significant Deficiencies. If your staff have any questions regarding how to address the findings of the sanitary survey, please contact Ricardi Duvil of my staff at (206) 553-2578. If the Tribe has taken any actions to address the July 2018 sanitary survey, please submit documentation and proof of significant deficiency corrections made to Mr. Duvil at duvil.ricardi@epa.gov.

We appreciate the Tribe's cooperation and timely response to the above requests. We also appreciate the Tribe's broader invitation to meet and further develop relationships with the EPA. Our Regional Administrator, Chris Hladick, is looking forward to meeting with the Tribal Council on December 4, 2018. This face-to-face meeting will provide an opportunity to discuss the path forward on the drinking water system deficiencies and other issues of importance to the Tribe.

Lastly, please feel free to contact me any time at (206) 553-1855. Our government-to-government relationship is of great value to the EPA and we want to continue working together, as partners, to address our shared environmental priorities.

Sincerely,



Daniel D. Opalski
Director

Enclosure A - Significant Deficiencies for Warm Springs Water Treatment Plant

cc: Alyssa Macy, Chief Operations Officer, Warm Springs Tribe

Travis Wells, General Manager, Warm Springs Tribe

Mathew Martinson, Indian Health Services

Enclosure A – Significant Deficiencies for Warm Springs Water Treatment Plant

- Page 3 # 91-WTP: The primary coagulant Aluminum Chlorohydrate (ACH) is not being optimized for the process. The Streaming Current Monitor (SCM) is operating but inaccurate and the operators do not jar test. Without having the SCM or daily jar testing, there is no accurate measure to indicate the correct dosage of ACH. Added to this concern is the injection of chlorine into the process at the point where the ACH is injected. This complicates the ACH dosage because chlorine interferes with the ACH.
- Page 5 # 137- Tee Wees: Access manhole openings for the storage structure are 4 inches or greater above the reservoir roof surface, with a lid 2 inches overlapping, water tight and locked. Top hatch needs a gasket.
- Page 6 # 138- The roof top vent has rusted through into the WST with holes and the vent needs 24-Mesh screen to prevent insect entrance.
- Page 6 # 137- Kah-Ne-Ta: Access manhole openings for the storage structure are 4 inches or greater above the reservoir roof surface, with a lid 2 inches overlapping, water tight and locked. Top hatch needs a gasket.
- Page 14 # 237- Small Out of Service Concrete WST needs to be physically disconnected from distribution system.
- Page 14 # 236-WTP CFE Turbidimeter sampling delay needs to be reduced.
- Page 14 # 235-WTP: River intake air scour system inoperative. Gasket blown on screen in river reducing effectiveness of air scour cleaning.
- Page 14 # 234-WTP: Filter #2 IFE Turbidimeter sampling pump is non-operable.
- Page 14 # 233-WTP: Turbidimeters are out of calibration.
- Page 14 # 232-WTP: Sedimentation basin needs settled solids removed.
- Page 12 # 162-WTP: Ventilation in the main service pump room is lacking and require the operators to run portable fans and opening the doors.
- Page 11 # 138-Greely East: overflow lines, air vents, drainage lines or clean out pipe turned downward or covered, screened and terminated a minimum of 2 times the diameter of the water outlet above the ground or storage structure surface. Overflow has flapper valve that does not fully seal.
- Page 11 # 137-Greely East: Access manhole openings for the storage structure are 4 inches or greater above the reservoir roof surface, with a lid 2 inches overlapping, water tight and locked. Unable to access top of water tank to inspect items listed.

- Page 11 # 136-Greely East: An overflow provided that discharges to daylight in a way that will preclude the possibility of backflow to the reservoir and, where practical, provided with a metal screen or flapper valve. Overflow lacks proper 24-mesh screen covering opening of pipe.
- Page 10 # 137-Greely West: Access manhole openings for the storage structure are 4 inches or greater above the reservoir roof surface, with a lid 2 inches overlapping, water tight and locked. Top hatch needs a gasket.
- Page 9 # 137- West Hills East: Access manhole openings for the storage structure are 4 inches or greater above the reservoir roof surface, with a lid 2 inches overlapping, water tight and locked. Unable to access top of water tank to inspect items listed.
- Page 9 # 136- West Hills East: An overflow provided that discharges to daylight in a way that will preclude the possibility of backflow to the reservoir and, where practical, provided with a metal screen or flapper valve. Overflow lacks proper 24-mesh screen covering opening of pipe.
- Page 9 # 135-West Hills East: The storage structure is not safely accessible to inspector. This storage tank is the oldest on the water system. The roof access ladder is unsafe due to not having a ladder cage.
- Page 8 # 138- West Hills West: Overflow lines, air vents, drainage lines or clean out pipe turned downward or covered, screened and terminated a minimum of 2 times the diameter of the water outlet above the ground or storage structure surface. The 24-mesh screen is torn on vent and a hole in the roof structure was found.
- Page 8 # 137- West Hills West: Access manhole openings for the storage structure are 4 inches or greater above the reservoir roof surface, with a lid 2 inches overlapping, water tight and locked. Top hatch needs a gasket.
- Page 8 # 136- West Hills West: An overflow provided that discharges to daylight in a way that will preclude the possibility of backflow to the reservoir and, where practical, provided with a metal screen or flapper valve. Overflow lacks proper 24-mesh screen covering opening of pipe.
- Page 7 # 138- Southeast: Overflow lines, air vents, drainage lines or clean out pipe turned downward or covered, screened and terminated a minimum of 2 times the diameter of the water outlet above the ground or storage structure surface. The roof top vent has rusted through into the WST with holes.
- Page 7 # 137-Southeast: Access manhole openings for the storage structure are 4 inches or greater above the reservoir roof surface, with a lid 2 inches overlapping, water tight and locked. Top hatch needs a gasket.
- Page 7 # 136-Southeast: An overflow provided that discharges to daylight in a way that will preclude the possibility of backflow to the reservoir and, where practical, provided with a metal screen or flapper valve. Overflow lacks proper 24-mesh screen covering opening of pipe.

From: [Travis Wells](#)
To: [Duvil, Ricardi](#)
Cc: [Alyssa Macy](#); [Chico Holliday](#); [Graham, Russell \(IHS/POR\)](#)
Subject: Turbidity Issue at the WS WTP
Date: Tuesday, October 16, 2018 3:52:53 PM
Attachments: [WTP ACH Info 10-12-18.pdf](#)
[Turb Cl2 report.xlsx](#)

Mr. Duvil,

Based on what we knew (myself, Chico and Russell) at the time we decided to issue a notice of the exceedance of the allowable turbidity levels at the Warm Springs Water Treatment Plant. We found out about the issue late Thursday (10/11/18) and met to discuss the issue first thing Friday morning (10/12/18). We made several attempts to get in touch with somebody from EPA with no success. We did issue a release of information to our local radio station to inform consumers that we did exceed the allowable turbidity levels.

The time line is as follows:

1615 hrs on 10/11/18 - i was notified via email by our Chief Operations Officer, who received a call from the IHS director Mathew Martinson regarding an issue with no coagulant being used in the treatment plant.

1650 hrs on 10/11/18 - I was finally able to confirm that the plant was being operated with the use of Aluminum Chlorohydrate (ACH) since the afternoon of 10/8/18. By the time I was able to find phone numbers for EPA contacts it was after 1700 hrs and I decided to address the issue first thing in the morning.

0800 hrs on 10/12/18 - met with the W&WW supervisor, the environmental health specialist and myself to discuss a course of action. Based on the info we had and the fact that the threat had largely come and gone we decided to issue the notice of the turbidity exceedance. We also made several attempts to contact the EPA offices with no success so our decision stood as we had originally decided.

1400 hrs - notice was issued to the local radio station.

We discussed the issue at length and the deciding factor was that the water system was already running 24 hours of properly treated water so flushing and issuing a boil notice didn't seem to make sense as the water was "good" water by the time we had been informed of the issue. It seemed unnecessary to flush good water and to issue a boil water notice for water that was then meeting the requirements.

We are also currently working on what needs to be done with the operator who continued to run even though there was no chemical to use. This is basic knowledge for an operator and should never have happened.

Ive attached the turbidity and chlorine level info you requested along with the notice we sent out last Friday.

Pleas contact me with any questions or concerns .

Travis Wells

General Manager

Branch of Public Utilities

Confederated Tribes of Warm Springs

p: 541.553.3452 m: 541.460.1262

f: 541.553.3380

a: 2251 Rehab Street

Warm Springs, OR 97761

w: warmsprings-nsn.gov e: travis.wells@wstribes.org

For advanced users:

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Date	Time	Chlorine	Turbidity
10/1/2018	12:00:01 AM	0.71	0.030
10/1/2018	2:00:01 AM	0.69	0.029
10/1/2018	4:00:01 AM	0.68	0.029
10/1/2018	6:00:01 AM	0.66	0.029
10/1/2018	8:00:01 AM	0.63	0.030
10/1/2018	10:00:01 AM	0.54	0.029
10/1/2018	12:00:01 PM	0.77	0.029
10/1/2018	2:00:01 PM	0.74	0.029
10/1/2018	4:00:01 PM	0.77	0.029
10/1/2018	6:00:01 PM	0.80	0.030
10/1/2018	8:00:01 PM	0.86	0.031
10/1/2018	10:00:01 PM	0.78	0.030
10/2/2018	12:00:01 AM	0.69	0.030
10/2/2018	2:00:01 AM	0.67	0.029
10/2/2018	4:00:01 AM	0.66	0.029
10/2/2018	6:00:01 AM	0.64	0.029
10/2/2018	8:00:01 AM	0.61	0.031
10/2/2018	10:00:01 AM	0.65	0.029
10/2/2018	12:00:01 PM	0.68	0.028
10/2/2018	2:00:01 PM	0.84	0.028
10/2/2018	4:00:01 PM	0.93	0.028
10/2/2018	6:00:01 PM	0.81	0.028
10/2/2018	8:00:01 PM	0.69	0.028
10/2/2018	10:00:01 PM	0.71	0.029
10/3/2018	12:00:01 AM	0.73	0.028
10/3/2018	2:00:01 AM	0.78	0.030
10/3/2018	4:00:01 AM	0.73	0.030
10/3/2018	6:00:01 AM	0.74	0.028
10/3/2018	8:00:01 AM	0.81	0.029
10/3/2018	10:00:01 AM	0.80	0.029
10/3/2018	12:00:01 PM	1.12	0.028
10/3/2018	2:00:01 PM	0.91	0.028
10/3/2018	4:00:01 PM	0.70	0.028
10/3/2018	6:00:01 PM	0.76	0.028
10/3/2018	8:00:01 PM	0.90	0.028
10/3/2018	10:00:01 PM	0.92	0.028
10/4/2018	12:00:01 AM	0.93	0.029
10/4/2018	2:00:01 AM	0.73	0.028
10/4/2018	4:00:01 AM	0.69	0.028
10/4/2018	6:00:01 AM	0.67	0.028
10/4/2018	8:00:01 AM	0.63	0.029
10/4/2018	10:00:01 AM	0.64	0.029
10/4/2018	12:00:01 PM	0.82	0.028
10/4/2018	2:00:01 PM	0.90	0.029
10/4/2018	4:00:01 PM	0.77	0.029

10/4/2018	6:00:01 PM	0.71	0.030
10/4/2018	8:00:01 PM	0.69	0.030
10/4/2018	10:00:01 PM	0.71	0.031
10/5/2018	12:00:01 AM	0.67	0.030
10/5/2018	2:00:01 AM	0.65	0.029
10/5/2018	4:00:01 AM	0.64	0.029
10/5/2018	6:00:01 AM	0.63	0.029
10/5/2018	8:00:01 AM	0.59	0.030
10/5/2018	10:00:01 AM	0.63	0.031
10/5/2018	12:00:01 PM	0.82	0.029
10/5/2018	2:00:01 PM	0.80	0.029
10/5/2018	4:00:01 PM	0.82	0.030
10/5/2018	6:00:01 PM	0.77	0.032
10/5/2018	8:00:01 PM	0.84	0.032
10/5/2018	10:00:01 PM	0.84	0.036
10/6/2018	12:00:01 AM	0.77	0.033
10/6/2018	2:00:01 AM	0.70	0.031
10/6/2018	4:00:01 AM	0.72	0.032
10/6/2018	6:00:01 AM	0.74	0.030
10/6/2018	8:00:01 AM	0.70	0.030
10/6/2018	10:00:01 AM	0.64	0.031
10/6/2018	12:00:01 PM	0.73	0.032
10/6/2018	2:00:01 PM	0.76	0.040
10/6/2018	4:00:01 PM	0.72	0.046
10/6/2018	6:00:01 PM	0.75	0.048
10/6/2018	8:00:01 PM	0.76	0.050
10/6/2018	10:00:01 PM	0.84	0.040
10/7/2018	12:00:01 AM	0.78	0.037
10/7/2018	2:00:01 AM	0.78	0.034
10/7/2018	4:00:01 AM	0.74	0.032
10/7/2018	6:00:01 AM	0.70	0.030
10/7/2018	8:00:01 AM	0.70	0.032
10/7/2018	10:00:01 AM	0.78	0.036
10/7/2018	12:00:01 PM	0.81	0.063
10/7/2018	2:00:01 PM	0.75	0.324
10/7/2018	4:00:01 PM	0.74	0.383
10/7/2018	6:00:01 PM	0.79	0.326
10/7/2018	8:00:01 PM	0.82	0.123
10/7/2018	10:00:01 PM	0.79	0.063
10/8/2018	12:00:01 AM	0.76	0.047
10/8/2018	2:00:01 AM	0.76	0.039
10/8/2018	4:00:01 AM	0.73	0.037
10/8/2018	6:00:01 AM	0.69	0.035
10/8/2018	8:00:01 AM	0.70	0.035
10/8/2018	10:00:01 AM	0.78	0.040
10/8/2018	12:00:01 PM	0.82	0.044
10/8/2018	2:00:01 PM	0.73	0.171

10/8/2018	4:00:01 PM	0.74	0.301
10/8/2018	6:00:01 PM	0.82	0.339
10/8/2018	8:00:01 PM	0.79	0.376
10/8/2018	10:00:01 PM	0.73	0.413
10/9/2018	12:00:01 AM	0.77	0.411
10/9/2018	2:00:01 AM	0.79	0.410
10/9/2018	4:00:01 AM	0.91	0.413
10/9/2018	6:00:01 AM	0.92	0.421
10/9/2018	8:00:01 AM	0.76	0.432
10/9/2018	10:00:01 AM	0.69	0.445
10/9/2018	12:00:01 PM	0.71	0.458
10/9/2018	2:00:01 PM	0.74	0.472
10/9/2018	4:00:01 PM	0.75	0.477
10/9/2018	6:00:01 PM	0.76	0.477
10/9/2018	8:00:01 PM	0.72	0.479
10/9/2018	10:00:01 PM	0.69	0.474
10/10/2018	12:00:01 AM	0.67	0.471
10/10/2018	2:00:01 AM	0.86	0.452
10/10/2018	4:00:01 AM	0.90	0.448
10/10/2018	6:00:01 AM	0.88	0.453
10/10/2018	8:00:01 AM	0.78	0.454
10/10/2018	10:00:01 AM	0.72	0.470
10/10/2018	12:00:01 PM	0.77	0.460
10/10/2018	2:00:01 PM	0.79	0.455
10/10/2018	4:00:01 PM	0.78	0.480
10/10/2018	6:00:01 PM	0.75	0.510
10/10/2018	8:00:01 PM	0.72	0.547
10/10/2018	10:00:01 PM	0.67	0.563
10/11/2018	12:00:01 AM	0.72	0.533
10/11/2018	2:00:01 AM	0.91	0.488
10/11/2018	4:00:01 AM	0.95	0.475
10/11/2018	6:00:01 AM	0.94	0.467
10/11/2018	8:00:01 AM	0.93	0.463
10/11/2018	10:00:01 AM	0.96	0.462
10/11/2018	12:00:01 PM	0.80	0.474
10/11/2018	2:00:01 PM	0.76	0.506
10/11/2018	4:00:01 PM	0.78	0.489
10/11/2018	6:00:01 PM	0.74	0.180
10/11/2018	8:00:01 PM	0.75	0.062
10/11/2018	10:00:01 PM	0.69	0.042
10/12/2018	12:00:01 AM	0.71	0.036
10/12/2018	2:00:01 AM	0.74	0.036
10/12/2018	4:00:01 AM	0.68	0.032
10/12/2018	6:00:01 AM	0.63	0.042
10/12/2018	8:00:01 AM	0.69	0.033
10/12/2018	10:00:01 AM	0.77	0.032
10/12/2018	12:00:01 PM	0.73	0.031

10/12/2018	2:00:01 PM	0.73	0.031
10/12/2018	4:00:01 PM	0.83	0.032
10/12/2018	6:00:01 PM	0.90	0.032
10/12/2018	8:00:01 PM	0.95	0.033
10/12/2018	10:00:01 PM	0.90	0.033



Confederated Tribes of Warm Springs, Oregon
Public Utilities Branch
PO Box 1196
Warm Springs, OR 97761
Phone: 541-553-3246
Fax: 541-553-3380

FOR IMMEDIATE RELEASE

October 12, 2018

The Warm Springs Water Treatment Plant had a turbidity exceedance event beginning in the afternoon of October 8th, 2018 through the afternoon of October 11th, 2018. Due to a shortage of a chemical used to coagulate the particles in the water, the turbidity of the treated water reached was higher than allowable. Turbidity is a measurement of the number and size of particles in the treated water and suggests a measure of the effectiveness of the filtration process.

At no time during the turbidity exceedance event was the disinfection process compromised with chlorine levels exceeding the minimum EPA requirement of 0.2 mg/L. Chlorine levels in our system average about 0.8 mg/L. Also, it has been suggested that other contaminants entered our system which is entirely untrue.

At this time, as a consumer, you are not required to do anything. This notification is meant to keep you, the consumer, informed of any unusual events that occur in your public drinking water system. Our staff will be temporarily increasing the testing frequency for bacteria and chlorine levels in addition to flushing parts of the system to assure your safety as a consumer. If any unusual results or contaminants are indicated we will inform the community of those issues and provide technical assistance on how to address those.

If you have further questions regarding this incident, please contact the Public Utilities Branch at (541) 553-3246 or the Environmental Health office at (541) 553-4943.



From: Duvil, Ricardi
Sent: Monday, October 15, 2018 8:07 AM
To: Travis Wells; russell.graham@wstribes.org
Cc: Folster, Laddie (IHS/POR); Tucker, Michelle
Subject: Turbidity issue /Boil Water-Warm Springs

Travis and Russell:

I want to schedule a conference call with both of you to discuss the Turbidity issue /Boil Water- at Warm Springs. Are you available between 9:00 am and 11:00 am this morning? Please let me know as soon as possible so that I can setup the call. Thanks !

Cheers,

Ricardi Duvil, Ph.D., P.E.
Environmental Engineer
U.S. Environmental Protection Agency
Office of Water and Watersheds
Drinking Water Unit, Region 10
1200 Sixth Ave., Suite 155, OWW-193
Seattle, WA 98101
Phone: (206)-553-2578
Fax: (206)-553-1280

From: Travis Wells [mailto:travis.wells@wstribes.org]
Sent: Friday, October 12, 2018 11:21 AM
To: Duvil, Ricardi <duvil.ricardi@epa.gov>
Subject: Boil Water Notice?

Mr. Duvil,

My office has been trying to contact you today with no luck. We have a very important issue that we are trying to resolve and I have been trying to get input from the EPA offices. Could you please respond by calling my office ASAP?

I can be reached at (541) 553-3452.

Travis Wells

General Manager
Branch of Public Utilities
Confederated Tribes of Warm Springs
p: 541.553.3452 **m:** 541.460.1262
f: 541.553.3380
a: 2251 Rehab Street
Warm Springs, OR 97761
w: warmsprings-nsn.gov **e:** travis.wells@wstribes.org

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From: Manheimer, Jenna
Sent: Monday, November 26, 2018 4:54 PM
To: Jennings, Marie
Cc: Duvil, Ricardi
Subject: Warm Springs Chairman + CC Email Addresses

Email Contacts for WST Letter:

Austin Greene, Jr.
Chairman, Confederated Tribes of Warm Springs
austin.greene@wstribes.org

Alyssa Macy
Chief Operating Officer, Confederated Tribes of Warm Springs
alyssa.macy@wstribes.org

Travis Wells
General Manager, Confederated Tribes of Warm Springs
travis.wells@wstribes.org

Mathew Martinson
Acting District Utility Consultant, Indian Health Service
Mathew.Martinson@ihs.gov

From: Manheimer, Jenna
Sent: Wednesday, November 7, 2018 9:37 AM
To: Tucker, Michelle; Duvil, Ricardi
Subject: Warm Springs Not Signing SS Report

Hi Michelle and Ricardi,

Ladd just let me know that Travis Wells from Warm Springs has not yet signed the SS report, which he's had since mid-August. Ladd has bugged him a few times, and he said he would have it done by next week. If Travis does not deliver, could you please let Ladd know how you would like to proceed?

Thank you,
Jenna

From: Duvil, Ricardi
Sent: Monday, November 19, 2018 3:19 PM
To: Travis Wells
Cc: Alyssa Macy; Jennings, Marie; Martinson, Mathew J (IHS/POR); Folster, Laddie (IHS/POR); Manheimer, Jenna; Clark, Johnny; Schuster, Jane; Bouck, Steve; Robinson, Lorie; Affeldt, Chris; Blust, Molly E.
Subject: Warm Springs Water System Turbidity Treatment Technique Violation _11_19_2018
Attachments: Warm Springs Water System_Turbidity_(TT)_Violation_ 11.19.2018.pdf; SWTRs Turbidity Exceedance Tier II - Public_Notice.doc; Warm Spring Water System_PUBLIC NOTICE CERTIFICATION FORM_November_19_ 2018.doc

Dear Mr. Wells:

As we discussed from our previous conversation, I have attached our Turbidity Treatment Technique Violation letter along with Tier II public notice requirements. As you know, turbidity must be less than or equal to 0.3 NTU in at least 95 % of the measurements taken each month. That is, 95 percent of the measurements recorded every 4 hours must be less than or equal 0.3 NTU over each calendar month period. Failure to meet the Combined Filter Effluent (CFE) requirements is a treatment technique violation.

If you have any questions or need help with the public notice requirements, feel free to contact me.

Thank you for your prompt attention to this important matter.

Cheers,

Ricardi Duvil, Ph.D., P.E.
Environmental Engineer
U.S. Environmental Protection Agency
Office of Water and Watersheds
Drinking Water Unit, Region 10
1200 Sixth Ave., Suite 155, OWW-193
Seattle, WA 98101
Phone: (206)-553-2578
Fax: (206)-553-1280

PUBLIC NOTICE CERTIFICATION FORM

PUBLIC WATER SYSTEM NAME Warm Springs Community Water System

PUBLIC WATER SYSTEM ID 104101247

DESCRIPTION OF VIOLATION(S) TURBIDITY EXCEEDANCE

VIOLATION DATE(S) November 19, 2018

The public water system named above hereby affirms that public notice has been provided to consumers in accordance with the delivery, content, and format requirements and deadlines as required by 40 CFR Part 141 Subpart Q.

☐ Consultation with EPA (if required) on the following date(s) _____

☐ Notice distributed by the following method(s) (for example, mail, posting, etc. _____

on the following date(s) _____

☐ Notice posted at the following location(s) _____

on the following date(s) _____

Signature of owner or operator

date

Send completed form and copy of public notice to EPA by

fax to (206) 553-1280 or

mail to Drinking Water Unit

Environmental Protection Agency

1200 Sixth Ave, Suite 155, OWW-193

Seattle, WA 98101-3123

Instructions for SWTRs Turbidity Exceedance Notice

Template on Reverse

Since surface water treatment filtration treatment technique violations require Tier 2 notification, you must provide public notice to persons served as soon as practical but within 30 days after you learn of the violation [40 CFR 141.203(b)]. This template may also be adapted for use with turbidity MCL violations. Your primacy agency may have more stringent requirements for treatment technique violations (e.g., it may require you to provide water from an alternate source). Check with your agency to make sure you meet all requirements. In addition:

<u>For Exceedances of Single Turbidity Limits</u>	<u>For Exceedances of Monthly Turbidity Limits</u>
<p>You must consult with your primacy agency as soon as practical but within 24 hours of learning of the violation. During the consultation, the agency may choose to elevate your turbidity exceedance to</p> <p>Tier 1. If consultation does not occur, the violation is automatically elevated to Tier 1 (use Template 1-7). For a Tier 2 notice, describe your violation as follows in the second paragraph of the notice:</p> <p>“Normal turbidity levels at our plant are [number] turbidity units. A water sample taken [date] showed levels of [number] turbidity units. This was above the standard of [standard] units. Because of these high levels of turbidity, there is an increased chance that the water may contain disease-causing organisms.”</p>	<p>Use the following language to describe your violation and insert into the second paragraph of the template:</p> <p>“Water samples for [month] showed that [percentage] percent of turbidity measurements were over [standard] turbidity units – the standard is that no more than 5 percent of samples may exceed [standard] turbidity units per month. The turbidity levels are relatively low. However, their persistence is a concern. Normal turbidity levels at our plant are [number] units.”</p>

Community systems must use one of the following methods [40 CFR 141.203(c)]:

- Hand or direct delivery
- Mail, as a separate notice or included with the bill

Noncommunity systems must use one of the following methods [40 CFR 141.203(c)]:

- Posting in conspicuous locations
- Hand delivery
- Mail

In addition, both community and noncommunity systems must use *another* method reasonably calculated to reach others if they would not be reached by the first method [40 CFR 141.203(c)]. Such methods could include newspapers, e-mail, or delivery to community organizations. If you mail, post, or hand deliver, print your notice on your system's letterhead, if available.

The notice on the reverse is appropriate for mailing, posting, or hand delivery. If you modify this notice, you must still include all required PN elements from 40 CFR 141.205(a) and leave the mandatory language unchanged (see below).

Mandatory Language

Mandatory language on health effects (from Appendix B to Subpart Q) must be included as written (with blanks filled in) and is presented in this notice in italics and with an asterisk on either end.

You must also include standard language to encourage the distribution of the public notice to all persons served, where applicable [40 CFR 141.205(d)]. This language is also presented in this notice in italics and with an asterisk on either end.

Corrective Action

In your notice, describe corrective actions you are taking. Listed below are some steps commonly taken by water systems with filtration treatment technique violations. Depending on the corrective action you are taking, you can use one or more of the following statements, if appropriate, or develop your own text:

- We added chemicals that reduce turbidity.
- We sampled both untreated and treated water for the presence of coliform bacteria.
- We monitored chlorine levels and adjusted them as needed to compensate for the filtration problems.
- We inspected and cleaned the filters.

After Issuing the Notice

Make sure to send your primacy agency a copy of each type of notice and a certification that you have met the public notice requirements within ten days after you issued the notice [40 CFR 141.31(d)].

SWTRs Turbidity Exceedance Notice

IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER

Warm Springs Water System PWS ID# 104101247 Did Not Meet Treatment Requirements-Turbidity

Our water system recently violated a drinking water requirement. Although this was not an emergency, as our customers, you have a right to know what happened, what you should do, and what we did (are doing) to correct this situation.

We routinely monitor your water for turbidity (cloudiness). This tells us whether we are effectively filtering the water supply. **[Insert appropriate description of the violation from instructions on the previous page.]**

What should I do?

- There is nothing you need to do. You do not need to boil your water or take other actions. We do not know of any contamination, and none of our testing has shown disease-causing organisms in the drinking water.
- If you have a severely compromised immune system, have an infant, are pregnant, or are elderly, you may be at increased risk and should seek advice from your health care providers about drinking this water. General guidelines on ways to lessen the risk of infection by microbes are available from EPA's Safe Drinking Water Hotline at 1-800-426-4791.

What does this mean?

This is not an emergency. If it had been, you would have been notified within 24 hours.

Turbidity has no health effects. However, turbidity can interfere with disinfection and provide a medium for microbial growth. Turbidity may indicate the presence of disease causing organisms. These organisms include bacteria, viruses, and parasites which can cause symptoms such as nausea, cramps, diarrhea, and associated headaches. These symptoms are not caused only by organisms in drinking water. If you experience any of these symptoms and they persist, you may want to seek medical advice.

What is being done?

[Describe the corrective actions and when the system returned or expects to return to compliance.]

For more information, please contact [name of contact] at [phone number] or [mailing address].

Please share this information with all the other people who drink this water, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools, and businesses). You can do this by posting this notice in a public place or distributing copies by hand or mail.

This notice is being sent to you by **[system]**. Water System ID#: _____.

Date distributed: _____.



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 155
Seattle, WA 98101-3123

OFFICE OF
WATER AND
WATERSHEDS

November 19, 2018

Travis Wells, General Manager
Warm Springs Water Treatment Plant
Confederated Tribes of Warm Springs
P.O. Box 1196
Warm Springs, Oregon 97761

Re: Treatment Technique (TT) Violation: Exceedance of Monthly Turbidity- 0.3 Nephelometric Turbidity Units (NTU)-Federal Violation Code # 44
Warm Springs Water Treatment Plant PWS ID# 104101247

Dear Mr. Wells:

We recently reviewed your monthly report for Combined Filter Effluent(CFE) Turbidity and your results for October 2018 showed that **13.77%** of turbidity measurements were above **0.3 NTU** and **86.23%** were below the standard turbidity level.

Under the Surface Water Treatment Rule(SWTR), for systems using conventional filtration or direct filtration, the turbidity level of representative samples of a system's filtered water must be less than or equal to 0.3 NTU in at least **95%** of measurements taken each month. That is, 95 percent of the measurements recorded every 4 hours must be less than or equal 0.3 NTU over each calendar month period.

It is important to know that the SWTR established treatment technique requirements for turbidity to protect public health. Turbidity is an indicator for (1) filtration efficiency for removal of pathogens and other particles, and (2) the treatability of the water by disinfection. A high turbidity level indicates the potential for pathogen breakthrough and interference with disinfection efficiency. In addition, your water system must calibrate the continuous turbidity monitor(s) at least once per week according to the procedures established in Method 2130 B of the 17th edition of Standard Methods for the Examination of Water and Wastewater.

Based on the monthly CFE turbidity report provided by your system on November 12, 2018, our review showed that the Warm Springs water system has failed to meet the turbidity level treatment technique requirements under the SWTR. **As a result, this is a treatment technique violation and requires Tier 2 public notification.**

A public water system that violates a TT is required to notify the public of this TT violation as soon as practical, but no later than 30 days after learning of the violation, so please make sure to notify your customers no later than 30 days after you receive this letter. The notice must be delivered by hand or by mail. It must also be made available to other persons served by the water system that have not been reached by the methods listed above, for example via newspaper, email or by posting in a public

location. Please see the enclosure titled “Public Notification Delivery Instructions” which provides more details about public notification delivery. You must also send a copy of the notice that you deliver to your customers as well as a completed certification form (enclosed) to the Environmental Protection Agency no later than ten days after you notify your customers.

We have drafted a public notice which you can distribute to your customers (see enclosure with the heading “Important Information about Your Drinking Water”). If you would like to prepare your own public notice, please contact Ricardi Duvil, Ph.D., P.E., SWTR manager, at duvil.ricardi@epa.gov or (206) 553-2578 so he can advise you as to which sections of this draft notice must be included in your notice exactly as written. If you would like to use the enclosed version of the notice, but would like to change something in it, for example, the water system contact, please contact Ricardi. He can make the change and send the revised notice to you, or he can send you an electronic copy of the notice and you can make changes yourself.

If you have any questions, please contact Ricardi Duvil, Ph.D., P.E., SWTR Manager, at the email address and phone number above.

Sincerely,



Marie Jennings
Drinking Water Unit Manager

Cc: Alyssa Macy, Chief Operations Officer

From: [Duvil, Ricardi](#)
To: [Jennings, Marie](#); [Contreras, Peter](#); [Baron, Adam](#); [Chung, Angela](#); [Wilson, Wenona](#); [Thurmon, Clarke](#); [Manheimer, Jenna](#)
Subject: Warm Springs Water Treatment follow-up and Phone Call to Travis Wells.

This meeting is to follow-up on Travis Wells's email and discuss next steps

Travis's email:

Ms. Jennings,

We are aware of the deadlines discussed in your email and we had every intention of meeting those deadlines prior to the federal government shutdown. As part of meeting those deadlines we were also working with the grant agency responsible for providing the necessary dollars to complete some of those tasks. As HUD is also a federal agency, they are shutdown as well and we have not been able to get any response from them nor do I expect to until the government is up and running again. As part of their requirements to receive the grant dollars, we (the tribe) are supposed to meet all their requirements prior to starting any of the identified work on their application. The one item we have been working on is the environmental assessment required to be completed before the grant dollars are available to spend. HUD has made it very clear that we are not to use any funds until the assessment is completed and accepted. Of the the three "critical" items described in your email, the cleaning of the contact basins was a part of that list. At this time, we will not be able to move forward until the government is up and running again and the environmental assessment is completed and accepted. As of this date and time, I do not know when that will be and until then we cannot complete the work as requested by the deadline. We can, however, work on getting the SOP in place and resolving the issue with the #2 turbidimeter. I am also planning to have my crews address as many if the deficiencies listed as possible so that we can document that they have been completed.

I would suggest that we possibly discuss this issue as soon as the government is running again so that we can address a reasonable time to complete the items listed in your email. Until then, we will hold off on completing those items that we identified in the HUD grant.

As always, I am available to discuss this in more detail at your convenience.

Travis Wells

General Manager

Branch of Public Utilities